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ATTORNEYS FOR DEFENDANT
PNEUMO ABEX LLC

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

<p>SALLY SYLVESTER, Individually and as Personal Representative of the Estate of Jesse Labrum, <i>et al.</i>,</p> <p>Plaintiffs,</p> <p>vs.</p> <p>BLUE BIRD CORPORATION, et al.,</p> <p>Defendants.</p>	<p>PNEUMO ABEX LLC’S MOTION TO EXCLUDE PLAINTIFFS’ EXPERTS’ UNRELIABLE CAUSATION OPINIONS</p> <p>Case No. 2:18-cv-00470-HCN-CMR</p> <p>District Judge Howard C. Nielson</p> <p>Magistrate Judge Cecilia M Romero</p>
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Pneumo Abex LLC (“Abex”) hereby moves the Court to exclude Plaintiffs’ experts’ causation opinions, which claim that alleged exposure to asbestos from automotive friction products was a substantial factor in causing Mr. Labrum’s mesothelioma.

Pursuant to DUCivR 7-1(a)(4), Abex’s incorporates by reference the arguments, reasons, and facts contained in Ford Motor Company’s Motion to Exclude Plaintiffs’ Experts’ Unreliable Causation Opinions and Memorandum in Support filed on April 26, 2021 (“Ford’s Motion”) (Dkt. 204). Like Ford, Abex is being sued in this case for automotive frictions products. Abex also notes that neither Dr. Brody’s Report (Exhibit 4 to Ford’s Motion) nor Dr. Holstein’s Report (Exhibit 5 to Ford’s Motion) mention any Abex product. For all the reasons discussed in Ford’s

Motion and the additional facts mentioned above, Abex moves the Court to exclude the Plaintiffs' experts' causation opinions, which claim that alleged exposure to asbestos from automotive friction products was a substantial factor in causing Mr. Labrum's mesothelioma.

DATED this 3rd day of May, 2021.

LEWIS BRISBOIS BISGAARD & SMITH LLP

By: /s/ Ronald L. Hellbusch
ATTORNEYS FOR DEFENDANT
PNEUMO ABEX LLC

CERTIFICATE OF SERVICE

I certify that on this 3rd day of May, 2021, I electronically filed and served the foregoing **PNEUMO ABEX LLC'S MOTION TO EXCLUDE PLAINTIFFS' EXPERTS' UNRELIABLE CAUSATION OPINIONS** to all counsel of record through the Court's electronic filing system.

/s/ Aren Branagh